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Attorneys for Defendant
MH SUB I, LLC

Attorneys for Express Mobile, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

EXPRESS MOBILE, INC.,

Plaintiff,

vs.

MH SUB I, LLC,

Defendant.

) Case No.: 3:19-cv-3352-RS

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1 IT IS HEREBY STIPULATED by and between Plaintiff Express Mobile, Inc. (“Express
2 Mobile”) and Defendant MH Sub I, LLC (“MH Sub”) as follows

3 WHEREAS, the Court entered a Case Management Scheduling Order on September 13,
4 2019 (Dkt. 28);

5 WHEREAS, the parties have agreed that it would be mutually beneficial to modify the case
6 schedule to continue to work to narrow the issues and to accommodate the parties continued intent to
7 engage in good faith settlement discussions;

8 WHEREAS, there have been no prior schedule modifications in this case;

9 NOW, THEREFORE, pursuant to Civil Local Rule 6-2, the parties hereby stipulate to the
10 following modifications to the Case Management Scheduling Order:

Description	Current Deadline	Proposed Deadline
Express Mobile serves Infringement Contentions and Document Production (LPR 3-1, 3-2)	11/7/2019	2/5/2020
MH Sub I serves Invalidity Contentions and Document Production (LPR 3-3, 3-4)	12/23/2019	3/18/2020
Exchange of proposed terms for claim construction (LPR 4-1)	1/6/2020	4/1/2020
Exchange of proposed claim constructions and extrinsic evidence, including any expert reports for claim construction (LPR 4-2)	1/27/2020	4/22/2020
Express Mobile serves Damages Contentions (LPR 3-8)	2/10/2020	5/6/2020
Joint Claim Construction and Prehearing Statement and exchange of any expert rebuttal reports for claim construction (LPR 4-3)	2/20/2020	5/13/2020
MH Sub I serves Responsive Damages Contentions (LPR 3-9)	3/11/2020	6/3/2020
Completion of claim construction discovery (including depositions of any experts for claim construction) (LPR 4-4)	3/20/2020	6/12/2020
Express Mobile files Opening Claim Construction Brief (LPR 4-5(a))	4/7/2020	7/1/2020
MH Sub I files Responsive Claim Construction Brief (LPR 4-5(b))	4/21/2020	7/15/2020
Express Mobile files Reply Claim Construction Brief (LPR 4-5(c))	4/28/2020	7/22/2020
Claim Construction hearing	5/13/20	8/14/2020 at 9:00 am

IT IS SO STIPULATED.

Dated: February 5, 2020

Respectfully Submitted,

1 By: /s/ Jeffrey Francis Craft
2 Jeffrey Francis Craft (SBN 147186)
3 jcraft@devlinlawfirm.com
4 DEVLIN LAW FIRM LLC
5 1731 Fox Springs Circle
6 Newbury Park, CA 91320

Attorneys for Plaintiff Express Mobile, Inc.

7 Dated: February 5, 2020

8 By: /s/ Michael P. Adams
9 Michael P. Adams (*Pro Hac Vice*)
10 madams@dykema.com
11 Dykema Gossett PLLC
12 111 Congress Ave, Suite 1800
13 Austin, Texas 78701

Attorneys for Defendant MH Sub I, LLC

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17 **SIGNATURE ATTESTATION**

18 Pursuant to Civil Local Rule 5-1(i)(3), I hereby certify that concurrence in the filing of
19 this document has been obtained from each of the other Signatories shown above.

20 Dated: February 5, 2020

21 By: /s/ Jeffrey Francis Craft
22 Jeffrey Francis Craft
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1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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4 Dated: 2/5/2020

A handwritten signature in blue ink, appearing to read "Richard Seeborg", is written over a horizontal line.

5 The Honorable Richard Seeborg
6 UNITED STATES DISTRICT JUDGE
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